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	Ľ		Attached is a draft transmittal letter to the Colorado Department of Public Health and
	L		
			Environment for the RSOP notification for RCRA unit closure of interim units 40.27 and 40.28 in
			Building 883. The draft transmittal letter has been prepared from DOE building point of contact
	-		
	┝	⊢	to CDPHE building point of contact; however, it could also be addressed from DOE RFCA
	_	Ш	coordinator to CDPHE RFCA coordinator.
		l	obstruction to obstruct in orthodorum action.
			Please contact Dyan Foss X7577 with questions or concerns.
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PARTIAL/OPEN		•	cc: Joe Legare



Kaiser-Hill Company, L.L.C.

RIG. & TYPIST INITIALS:

RF-46469(Rev.9/94)

Courier Address: Rocky Flats Environmental Technology Site, State Hwy. 93 and Cactus, Rocky Flats, CO 80007 • 303.966.7000

Mailing Address: PO Roy 464 Golden Coloredo 80402.0464

ADMIN RECORD

APR: -8 2002. Attachment Steve Tower FEG-003-02

Page 1 of 11

DRAFT

David Kruchek
Colorado Department of Health and Environment
4300 Cherry Creek Drive South
Denver, CO 80222-1530

RSOP FOR COMPONENT REMOVAL, SIZE REDUCTION, AND DECONTAMINATION ACTIVITIES NOTIFICATION LETTER FOR RCRA UNIT CLOSURE OF INTERIM UNITS 40.27 AND 40.28 IN BUILDING 883

Mr. Kruchek:

In accordance with the Rocky Flats Cleanup Agreement Standard Operating Protocol (RSOP) for Component Removal, Size Reduction and Decontamination Activities, this letter and its attachments is notification for RSOP implementation. This notification is for RCRA unit closure of interim units 40.27 and 40.28 in Building 883. Activities will be designed to achieve the closure performance standard, protect human health and the environment, and minimize waste. Specific work instructions, with engineering, health and safety, and waste management information, will be developed prior to start of closure activities. These instructions will be developed in accordance with applicable RFETS policies and procedures.

The appropriate documentation required by the RSOP is attached to this letter and should provide the necessary information. This work will be conducted in accordance with the work control documentation prepared by the subcontractor. The exact methods and process selected by the subcontractor and progress of the activities will be communicated to DOE/LRA through the consultative process, particularly the monthly RISS production meetings. The facility will not be breached during the activity.

As indicated in the RSOP, the LRA has 30 days to review the RSOP notification letter and provide feedback, including a definitive reason for not proceeding with the project. If no feedback is received within 30 days, the project will proceed as planned.

If you have any questions regarding this, please contact me at (303) 966-2133.

Steve Tower
U.S. Department of Energy



Project scope: RCRA Unit closure of units 40.27 and 40.28															
Facility description: Building 883, Uranium Rolling and Forming Facility															
Desc	ription of pl	anned s	activit	iy(ies):	RCRA	unit closu	ıre								
•	lity/rooms/se					ıg 883, Roc	om 139,	Area AD	<u> </u>						
	CRA unit clo							-4- 4-4			•		~	1_	/es
L	If RCRA units are included, attach unit specific information sheets and drawings														
	Attach checklists from Appendix A of the RSOP. No checklists are provided; the checklists submitted with the											action			
Build	ling 883 notif	fication	cover	the com	ponent r	removal/siz	te		econt	ami	natio	n		_	
reduc	ction/deconta	minatio	n acti	vities as	sociated	with RCR	A closur				,	5			
KLA	R Status	>	RL	CR com	plete and	d concurr	ence rec	eived: 1/8/0)2						·
	RLCR initiated but incomplete; concurrence anticipated:														
			RL	l has no	t been ir	aitisted ¹ s	nd is scl	heduled for	initis	tior	on:			_	
	CR is not co will be used											-			
Activ	vity requires	modific	cation	to the	ARARs	listed in th	ne RSOI	P.				Yes,	attaci	h to	letter
			·								V	No	_		
	ch Administr										<u> </u>	<u></u>			
	t of contact f			ity/activ	ity: Ke	ent Dorr, 3	03-966-	6034							
	tion of work			2 mont				nticipated				March			
Attac	Attach schedule for each facility or activity for information purposes. Schedule submitted with the Building 883 notification included the RCRA unit closure activities														
Does	the activity	involve	remo	ving cor	ntamina'	ted portio	ns of the	e building	T			, LRA ¢			
shell?	? Include a d	escripti	on of	the activ	ity, conte	amination	levels a	nd controls	L			concur	rence	: rec	quired
	✓ No														
Are there deviations/exceptions to the RSOP for the proposed activity(ies)?															
→ No											No				
Provide an explanation of deviation/exception to the RSOP: Not applicable C. Check the appropriate resulting action box below															
Additional RFCA decision document required (PAM – IM/IRA)															
	Major modification to RSOP Field change to RSOP														
	Minor modification to RSOP LRA consultation														

Evaluate using DPP, Sections 1.1.4 and 1.1.5 and the consultative process to implement activities

Ac	tivity(ies) will	result in	the fo	llowing w	aste (ypes				Process waste	
										~	Remediation waste	
	TRU	v	LLW	V.	LLMW	~	Haz.	~	Sanitary	Othe	r: ·	
LRA Notification Review Time							14 days, no RCRA unit closure involved					
					Ī	~	30 days, RCRA unit closure involved					

.

Administrative Record Requirements for this Activity

- Final Rocky Flats Cleanup Agreement (RFCA)
- RFETS Decommissioning Program Plan (DPP)
- RFCA Standard Operating Protocol for Component Removal, Size Reduction, and Decontamination Activities
- Reconnaissance Level Characterization Report 883 Cluster Closure Project
- Building 883 Closure Project Scoping Meeting Minutes/Disposition
- Notification Letter and subsequent CDPHE correspondence, if appropriate

INTRODUCTION

The Rocky Flats Environmental Technology Site's (RFETS) "RFCA Standard Operating Protocol (RSOP) for Facility Component Removal, Size Reduction, and Decontamination Activities, Section 5.0, Revision 0, 4 February 2001" addresses closure of RCRA regulated units.

This document applies to Tank T-1, Tank T-2, all ancillary equipment, and secondary containment. Complete closure will be accomplished in accordance with one of the options noted in the RSOP for Facility Component Removal, Size Reduction, and Decontamination Activities.

Activities will be designed to achieve the closure performance standard, protect human health and the environment, and minimize waste. Specific work instructions, with engineering, health and safety, and waste management information, will be developed prior to start of closure activities. These instructions will be developed in accordance with applicable RFETS policies and procedures.

SYSTEM HISTORY AND WASTE CHARACTERIZATION

The (T-1 and T-2) Interim Status Units 40.27 and 40.28 were utilized to capture spent nitric acid from the metal fabrication and etching process located on the "C" side of B883. Waste in the T-1 and T-2 tank system was characterized as corrosive, due to the nitric acid. Acids in the tanks were neutralized with caustic prior to transfer to the B374 Liquid Waste Operations.

Closure was attempted on Tanks T-1 and T-2 during 1998 via the wash, triple-rinse and sample method. Closure standards were not attained; rinsate results for arsenic (D004) concentrations were reported at 5.6 mg/l. All other analytes were below the RFCA Attachment 5, Table 2, Tier II - Groundwater Action Levels. Both the tanks and the secondary containment structure for these tanks were declared RCRA Stable by CDPHE on August 23, 1999.

SYSTEM BOUNDARIES

The interim status units include tanks T-1, T-2, all remaining ancillary equipment, and the secondary containment. Each stainless tank is rectangular, measuring 3-ft wide, 8-ft long and 6-ft deep. These tanks are physically located in a concrete pit on the west side of B883 having dimensions 12 feet 9 inch by 15 feet by 12 feet deep. This pit is located on the first floor of B883 in room 139. The area is considered confined space and a contaminated area (CA). The ancillary equipment includes:

- Ancillary piping
- Secondary containment (concrete pit)
- Transfer pump
- · Waste transfer station
- Valve vault (outside the building)
- Sump

Please see the drawings for the boundaries of the units.



SOIL CONTAMINATION EVALUATION AND POST CLOSURE CARE

Tanks T-1 and T-2 are currently contained in a concrete pit, inside of Building 883. Therefore, it is anticipated that soil in the area will not be exposed to contaminants (if any) associated with these tanks and/or associated equipment or structures. Soil sampling is not planned with regard to the activities covered by this RSOP. If there are any below grade (process waste) pipes associated with these tanks, they will be addressed by ER during remediation activities. ER will perform any soil sampling associated with removal of below grade piping at the time of remediation.

RECORDKEEPING

RCRA unit closure activities will be documented in the Pre-Demolition Survey Report (PDSR) which will be completed prior to building demolition. When final closure of units 40.27 and 40.28 is completed, the Site's Master List of RCRA units will be updated with the closure status and a permit modification will be submitted to remove the units from the RCRA Part A Permit.

BUILDING 883, RCRA UNIT-SPECIFIC CLOSURE INFORMATION

	_								
AD	40.27	Acid Etch Tank T-1	RCRA stable						
AD	40.28	Acid Etch Tank T-2 RCRA stable							
Closure Method:		The tanks, piping and pumps will be closed by removal. The EPA code for arsenic (D004) will apply to all waste generated from unit removal (i.e., tanks and ancillary equipment). The concrete secondary containment (i.e., pit) will be clean closed using "Clean Closure Option #3," under Section 5.1.1 of the RSOP for Facility Component Removal, Size Reduction and Decontamination Activities.							
Waste D	isposal:	Waste, including tanks, ancillary equipment, concrete, etc., will be shipped directly to an approved disposal facility or stored in an onsite storage unit until shipment can be scheduled. Tanks will be deformed in such a way that the tanks are incapable of holding 75 percent of their original volume. All waste will be LLM.							

BUILDING 883, RCRA-REGULATED UNITS

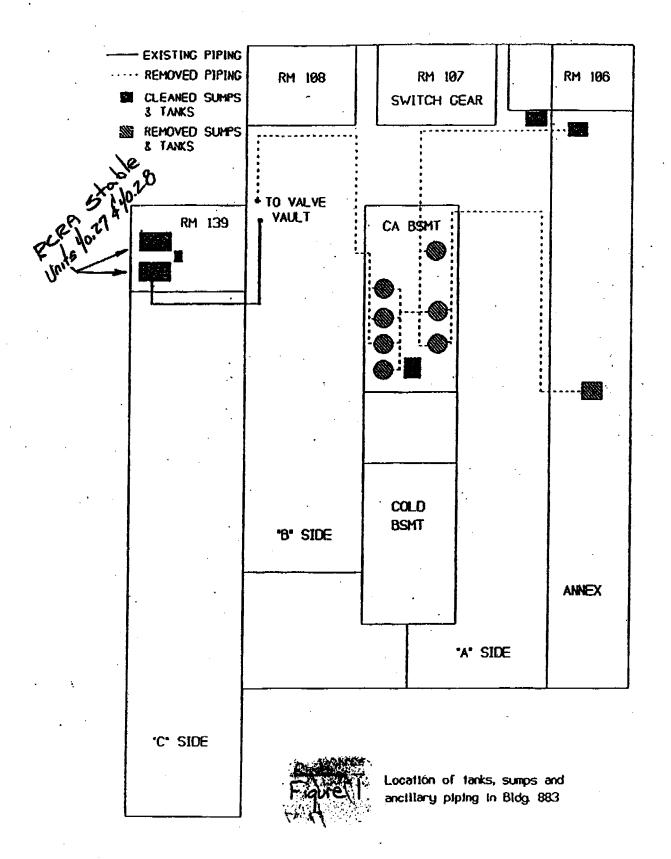
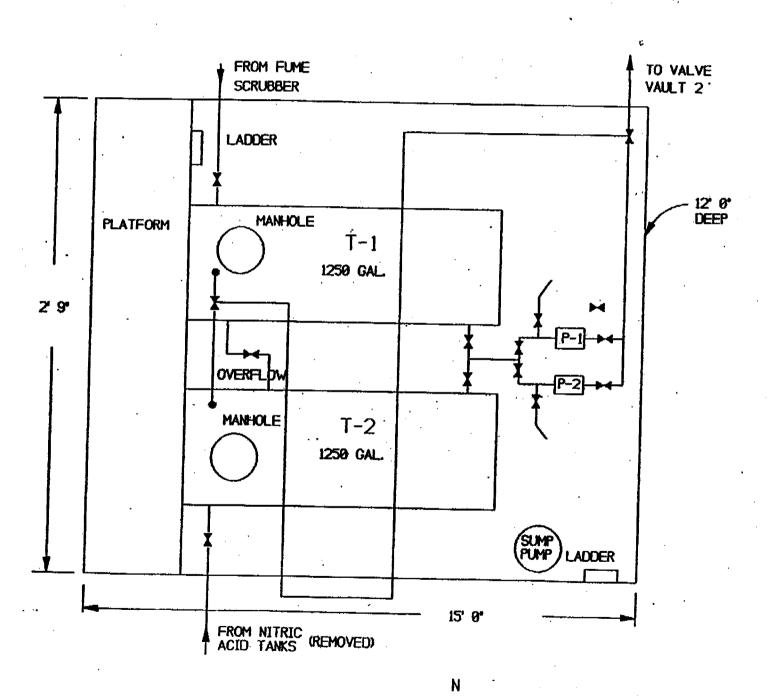
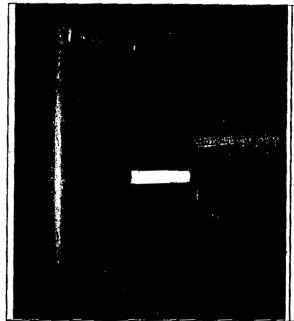


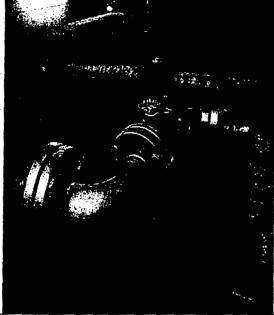
Figure 7 Secondary Containment Diagram
B883 RCFA STABLE
UNITS 40.27\$40.28



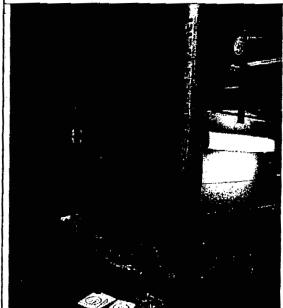
FLOOR PLAN



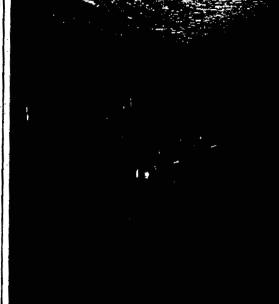
B883: RCRA Units 40.27 and 40.28 (Tanks T-1 and T-2) in foreground. Note ancillary piping and concrete walls of the subsurface pit containing these tanks.



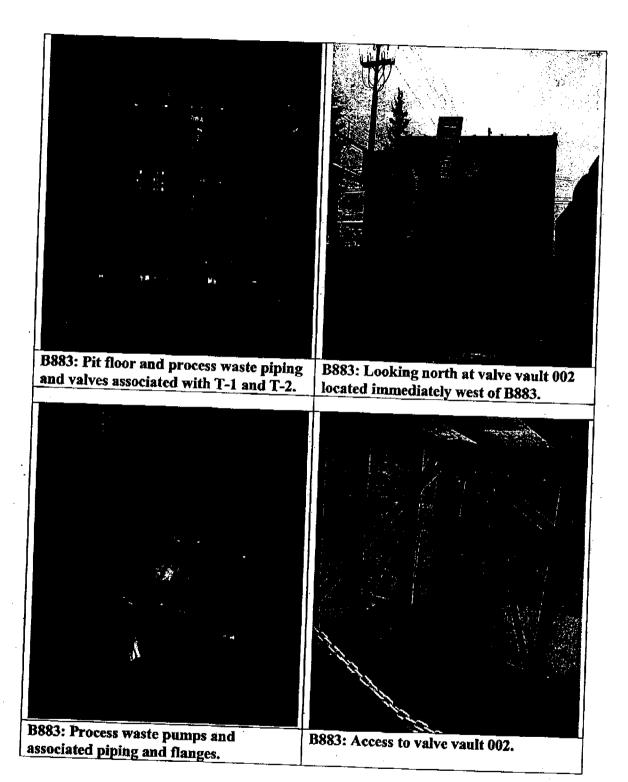
B883: Close-up of flanged stainless steel piping associated with T-1 and T-2.



B883: Close-up of flanged-off piping associated with T-1 and T-2.



B883: Ancillary process waste piping located beneath Tanks T-1 and T-2.



12/12